

(b) (6)

From: (b) (6)
Sent: Thursday, January 12, 2017 6:29 PM
To: (b) (6)
Subject: FW: Referral/Callback Requested

The EPA OIG has forwarded your email to the EPA, Office of Water, as Hotline 2017-0094. They will be responding to your email. No further action is planned by the EPA OIG.

Special Agent (b) (6)
Desk Officer for the EPA, OIG Hotline
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460

Hotline - 202-566-2476 or 888-546-8740
Hotline Fax 202-566-2599 Web Address oig_hotline@epa.gov

Hotline records are protected under the Privacy Act 5 U.S.C. § 552a. All EPA employees handling protected information have a legal and ethical obligation to hold that information in confidence and to actively protect it from improper uses. Except as specifically authorized, EPA employees shall not disclose, directly or indirectly the contents of any record about another individual to any person or organization. EPA employees who willfully release protected information, without authority, may be guilty of a misdemeanor and fined up to \$5,000. In addition, any employee violating the Privacy Act or EPA regulations is subject to disciplinary action, which may result in dismissal.

From: (b) (6) On Behalf Of OIG Hotline
Sent: Wednesday, November 30, 2016 4:25 PM
To: (b) (6)
Subject: FW: Referral/Callback Requested

I have received your email. I will be forwarding it to the EPA OIG Office of Program Evaluation for determination if it is under the purview of our office.

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From: Webmail (b) (6)
Sent: Wednesday, November 30, 2016 10:05 AM
To: OIG Hotline <OIG_Hotline@epa.gov>
Subject: Referral/Callback Requested

November 30, 2016

I am looking for guidance as to whether or not the EPA OIG is the appropriate avenue for my issue. I want to complain about an EPA-funded, primacy State (Utah) drinking water program violating EPA Safe Drinking Water Act regulations, and violating that State's own implementing Rules.


The issue is rather technical. Can someone with expertise in water engineering and science contact me?

Here's a brief technical synopsis:

EPA regulates primary and secondary disinfection of drinking water. Distinction is made between primary disinfectant chemicals and secondary disinfectant chemicals. EPA publishes disinfection efficacy information (concentration x time = required "CT" levels in drinking water) for primary chemical disinfectants. EPA does not publish "CT" requirements for every secondary chemical disinfectant. State approval of a secondary-only chemical disinfectant -- for which there is no EPA "CT" published "CT" data -- for a primary disinfection application creates, in my professional judgment, an imminent public health hazard.

I am seeking guidance as how to bring this imminent public health hazard to the attention of EPA or other proper authorities. Perhaps EPA OIG responsibility for investigation of EPA funds mismanagement is the proper avenue for my complaint.

(b) (6)



(b) (6)

From: Copper, Carolyn
Sent: Wednesday, March 15, 2017 10:26 AM
To: (b) (6)
Cc: Butler, Kathlene
Subject: FW: FW: OIG Hotline Complaint -- Office of Water Response -- Follow-up

Hi (b) (6) – As you recall, OW provided us with a very complete response on the Hotline we referred to them. We consider this complaint closed. However, I have not (yet) heard back from them on our request for permission to release their response letter to the complainant.

I just wanted to update you. If you need something more from us, please let me know.

Thanks ~ Carolyn

From: Copper, Carolyn
Sent: Tuesday, March 07, 2017 5:27 PM
To: Shapiro, Mike <Shapiro.Mike@epa.gov>
Cc: Vazquez, Sharon <Vazquez.Sharon@epa.gov>; Drummond, Laura <Drummond.Laura@epa.gov>; Moore, Steven <Moore.Steven@epa.gov>; Thomas, Deb <thomas.debrah@epa.gov>; Butler, Kathlene <Butler.Kathlene@epa.gov>; Penman, Crystal <Penman.Crystal@epa.gov>
Subject: RE: FW: OIG Hotline Complaint -- Office of Water Response -- Follow-up

Thank you Mike. This is responsive to our questions. We appreciate and acknowledge the time you've taken to address the concerns that were brought to our attention.

I contacted Crystal yesterday to be sure OW also understood that we were seeking permission to release your Feb 13, 2017 response memo to the complainant in this matter. We look forward hearing from you on this final issue.

~Carolyn

From: Penman, Crystal **On Behalf Of** Shapiro, Mike
Sent: Friday, March 03, 2017 3:14 PM
To: Copper, Carolyn <Copper.Carolyn@epa.gov>
Cc: Vazquez, Sharon <Vazquez.Sharon@epa.gov>; Drummond, Laura <Drummond.Laura@epa.gov>; Moore, Steven <Moore.Steven@epa.gov>; Thomas, Deb <thomas.debrah@epa.gov>; Butler, Kathlene <Butler.Kathlene@epa.gov>
Subject: FW: OIG Hotline Complaint -- Office of Water Response -- Follow-up

Carolyn,

I wanted to provide you an update regarding OW's projected completion dates for the anticipated actions summarized in response to question 5.

Please see the responses below.

1. Identifying the use of Dichlor or Trichlor by public water systems nationwide – (b) (5)

[REDACTED]

2. Conveying concerns regarding the disinfectant residual measurement for inactivation, and – (b) (5)

[REDACTED]

3. Issuing a memorandum recommending that the primacy agencies review Surface Water Treatment Rule information from public water systems that have installed Dichlor or Trichlor as treatment. When your office issues the memorandum, please send a courtesy copy to Katie Butler (butler.kathlene@epa.gov), EPA OIG's Director of Water Program Evaluations. (b) (5)

Michael Shapiro
Acting Assistant Administrator, Office of Water
US EPA, 4101M
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-564-5700

(b) (6)

From: (b) (6)
Sent: Tuesday, February 28, 2017 4:30 PM
To: Copper, Carolyn
Cc: El-Zoghbi, Christine; Butler, Kathlene; Dutton, Allison
Subject: RE: Office of Inspector General Hotline Complaint 2017-0094--Office of Water Response--2017-0094
Attachments: 2017-0094 OW Response.pdf

Thanks for discussing this today. We agreed that OPE should send a memo for your questions and how to reply to the complainant. I have attached OW response for the memo. Please send me any documents that you want included in the Hotline file that are send or received. (b) (6)

Special Agent (b) (6)
Desk Officer for the EPA, OIG Hotline
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460
Voice - (b) (6) Cell (b) (6)

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From: Copper, Carolyn
Sent: Wednesday, February 22, 2017 6:25 PM
To: (b) (6) @epa.gov>
Cc: El-Zoghbi, Christine <El-Zoghbi.Christine@epa.gov>; Butler, Kathlene <Butler.Kathlene@epa.gov>; Dutton, Allison <Dutton.Allison@epa.gov>
Subject: RE: Office of Inspector General Hotline Complaint 2017-0094--Office of Water Response

H (b) (6) – We’ve reviewed OW’s response and find it fully responsive to the questions we asked.

Below is a communication we drafted for you to send to OW to close the loop with them on this matter. I advise we ask OW for permission to release their response letter to the complainant. This seems the most efficient way to inform the complainant and it prevents us from having to translate the response to the complainant. Note the DATE placeholder below – we suggest the date is 2 weeks from when you send the email.

Please let me know if you have other thoughts on this.

Thanks ~ Carolyn

Acting Assistant Administrator Shapiro:

Thank you for your letter (dated February 13, 2017) in response to OIG Hotline Complaint 2017-0094. We reviewed your letter and determined you sufficiently answered our questions.

However, we request projected completion dates for the anticipated actions summarized in response to our question 5, including,

1. Identifying the use of Dichlor or Trichlor by public water systems nationwide,
2. Conveying concerns regarding the disinfectant residual measurement for inactivation, and
3. Issuing a memorandum recommending that the primacy agencies review Surface Water Treatment Rule information from public water systems that have installed Dichlor or Trichlor as treatment.

When your office issues the memorandum (under 3), please send a courtesy copy to Katie Butler (butler.kathlene@epa.gov), EPA OIG's Director of Water Program Evaluations.

OIG Hotline protocols require a communication to the complainant to inform them of the status of the complaint. Based on your office's detailed response, OIG will communicate that we have closed this complaint and are not performing further work. In addition, we would like to provide a copy of your Feb 13, 2017 response to the complainant. Please provide a response to our request to release the Feb 13, 2017 memorandum and provide projected completion dates for 1-3 above by (DATE).

From: Copper, Carolyn
Sent: Wednesday, February 15, 2017 12:55 PM
To: (b) (6) @epa.gov
Cc: El-Zoghbi, Christine <El-Zoghbi.Christine@epa.gov>; Butler, Kathlene <Butler.Kathlene@epa.gov>; Dutton, Allison <Dutton.Allison@epa.gov>
Subject: FW: Office of Inspector General Hotline Complaint 2017-0094--Office of Water Response

Thanks (b) (6). We will review and offer feedback on your question about communication to the complainant. One additional issue for OPE review is whether the OW response suggests to us that we need do any further work.

Katie – Alli – I know we're all busy; can we plan to discuss the response and next steps by next Tuesday (2/21)?

~Carolyn

From: (b) (6)
Sent: Wednesday, February 15, 2017 12:45 PM
To: Copper, Carolyn <Copper.Carolyn@epa.gov>; El-Zoghbi, Christine <El-Zoghbi.Christine@epa.gov>
Subject: FW: Office of Inspector General Hotline Complaint 2017-0094--Office of Water Response

Please find attached Office of Water response. Need OPE help on how are we to communicate this response to the complainant. I guess it could be a FOIA issues since we do not have the authority to release the information from the Agency. Please advise. (b) (6)

Special Agent (b) (6)
Desk Officer for the EPA, OIG Hotline
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460
Voice - (b) (6) Cel (b) (6)

Hotline - 202-566-2476 or 888-546-8740
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another individual to any person or organization. EPA employees who willfully release protected information, without authority, may be guilty of a misdemeanor and fined up to \$5,000. In addition, any employee violating the Privacy Act or EPA regulations is subject to disciplinary action, which may result in dismissal.

From: Penman, Crystal **On Behalf Of** Shapiro, Mike

Sent: Wednesday, February 15, 2017 11:39 AM

To: (b) (6) @epa.gov>

Cc: Thomas, Deb <thomas.debrah@epa.gov>

Subject: Office of Inspector General Hotline Complaint 2017-0094

(b) (6)

From: Copper, Carolyn
Sent: Tuesday, February 28, 2017 5:00 PM
To: (b) (6)
Subject: FW: OIG Hotline Complaint -- Office of Water Response -- Follow-up
Attachments: OIG Hotline Complaint 2017.0094.pdf; 2017-0094 referral.pdf

FYI. Please note OW's response date is March 14. I'll keep you informed.

From: Copper, Carolyn
Sent: Tuesday, February 28, 2017 4:56 PM
To: Shapiro, Mike <Shapiro.Mike@epa.gov>
Cc: Thomas, Deb <thomas.debrah@epa.gov>; Penman, Crystal <Penman.Crystal@epa.gov>; Butler, Kathlene <Butler.Kathlene@epa.gov>
Subject: OIG Hotline Complaint -- Office of Water Response -- Follow-up

Mike – Thank you for the detailed and very clear response to our Hotline referral. My office, which is leading the review of this complaint, has just a few additional requests so that we can close out this Hotline. (b) (6) preferred that I follow-up with you directly.

We request OW's projected completion dates for the anticipated actions summarized in response to our question 5, including,

1. Identifying the use of Dichlor or Trichlor by public water systems nationwide,
2. Conveying concerns regarding the disinfectant residual measurement for inactivation, and
3. Issuing a memorandum recommending that the primacy agencies review Surface Water Treatment Rule information from public water systems that have installed Dichlor or Trichlor as treatment. When your office issues the memorandum, please send a courtesy copy to Katie Butler (butler.kathlene@epa.gov), EPA OIG's Director of Water Program Evaluations.

The OIG Hotline protocols require a communication to the complainant to inform them of the status of the complaint. Based on your office's detailed response, OIG will communicate that we have closed this complaint and are not performing further work. We would also like to provide the complainant a copy of your Feb 13, 2017 response to us. This supports transparency and prevents OIG from needing to translate your response or provide a rough sketch of the very comprehensive response you provided.

We appreciate if you can reply back on our request to release OW's Feb 13, 2017 memorandum to the complainant, and provide projected completion dates for 1-3 above, by March 14, 2017.

Please reach out if I can help with any questions. Thank you again for your timely and complete response.

~Carolyn

Carolyn Copper, PhD
Assistant Inspector General for Program Evaluation
Office of Inspector General
United States Environmental Protection Agency
Washington, DC

202-566-0829

copper.carolyn@epa.gov

From: Penman, Crystal **On Behalf Of** Shapiro, Mike

Sent: Wednesday, February 15, 2017 11:39 AM

To: (b) (6) [\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)

Cc: Thomas, Deb <thomas.debrah@epa.gov>

Subject: Office of Inspector General Hotline Complaint 2017-0094

(b) (6)

From: Copper, Carolyn
Sent: Wednesday, January 04, 2017 7:06 PM
To: (b) (6)
Cc: El-Zoghbi, Christine; Butler, Kathlene; Dutton, Allison
Subject: FW: Hotline 2017-0068- Due 12/27/2016 -State of Utah Violating EPA Safe Drinking Water Act
Attachments: 2017-0068 Eval.pdf; Utah referral hotline 2017-0068.doc

(b) (6) – Alli contacted the complainant and had a very productive and informative conversation with (b) (6). Based on our review of the complaint and discussion with the complainant, I recommend we refer this to OW, with a request for some information from OW. Alli and Katie drafted the attached referral letter in the style you use. We hope this helps. Let us know if you need anything else.

Thanks ~ Carolyn

From: Copper, Carolyn
Sent: Friday, December 16, 2016 5:17 PM
To: Butler, Kathlene <Butler.Kathlene@epa.gov>
Cc: El-Zoghbi, Christine <El-Zoghbi.Christine@epa (b) (6)@epa.gov>
Subject: FW: Hotline 2017-0068- Due 12/27/2016 -State of Utah Violating EPA Safe Drinking Water Act

(Thanks (b) (6)

Katie – (b) (5)

~Carolyn

From: (b) (6)
Sent: Tuesday, December 06, 2016 2:19 PM
To: Copper, Carolyn <Copper.Carolyn@epa.gov>; El-Zoghbi, Christine <El-Zoghbi.Christine@epa.gov>
Subject: Hotline 2017-0068- Due 12/27/2016 -State of Utah Violating EPA Safe Drinking Water Act

Special Agent (b) (6)
Desk Officer for the EPA, OIG Hotline
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

January 12, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0094

FROM:

(b) (6)

Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO:

Joel Beauvais
Deputy Assistant Administrator
Office of Water

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received an electronic message from (b) (6) a drinking water engineer in the State of Utah. (b) (6) reported a potential human health risk from using Dichlor/Trichlor, a disinfectant for which there is no EPA-published concentration/time requirement.

This Hotline was referred to EPA, OIG Office of Program Evaluation (OPE) for review. Based on the potential for imminent human health risks from using an unapproved disinfectant in public water systems, OPE requested that the Hotline make a referral to the Office of Water (OW). Our review indicates that this issue may affect public water systems across multiple EPA regions. OPE has asked that OW review the complaint for appropriate handling. Specifically, OPE is requesting your response to the following five questions:

- (1) Are Dichlor or Trichlor disinfectants approved by EPA for primary or secondary disinfection of drinking water?
- (2) Has the EPA published concentration/time (CT) tables for Dichlor or Trichlor disinfectants?
- (3) Has the EPA established an analytical method to measure disinfection residual in the presence of Dichlor or Trichlor disinfectants?
- (4) Has the EPA determined the number of public water systems currently using Dichlor or Trichlor disinfectants for primary or secondary disinfection?
- (5) For public water systems who have installed Dichlor or Trichlor disinfectant treatment with or without primacy agency approval, please describe any next steps the EPA will take to refer this matter to the proper authorities, or other steps the EPA believes should be taken.

We established EPA OIG Hotline Number 2017-0094, to document the complaint. However, we are referring this matter to your office to address OIG's questions and for whatever action you determine necessary. Please inform the Hotline at (b) (6) @epa.gov within the next 5 calendar days that this referral was received. It is also requested that OW report back to the EPA OIG Hotline its progress in responding to our questions, or reviewing or taking action on this referral within 30 days from receipt of this memorandum. Please do not hesitate calling me at (202) (b) (6) if there are any questions.

Attachment:

CC: Shaun McGrath, Regional Administrator, Region 8

(b) (6)

From: Webmail (b) (6)
Sent: Wednesday, November 30, 2016 10:05 AM
To: OIG Hotline
Subject: Referral/Callback Requested

November 30, 2016

I am looking for guidance as to whether or not the EPA OIG is the appropriate avenue for my issue. I want to complain about an EPA-funded, primacy State (Utah) drinking water program violating EPA Safe Drinking Water Act regulations, and violating that State's own implementing Rules.

The issue is rather technical. Can someone with expertise in water engineering and science contact me?

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I am seeking guidance as how to bring this imminent public health hazard to the attention of EPA or other proper authorities. Perhaps EPA OIG responsibility for investigation of EPA funds mismanagement is the proper avenue for my complaint.

(b) (6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

January 12, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0094

FROM: (b) (6)
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Joel Beauvais
Deputy Assistant Administrator
Office of Water

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Attachment:

CC: Shaun McGrath, Regional Administrator, Region 8